

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

CHRISTINA CARAMORE and MICHELLE  
MARTIN, individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

MAIDENFORM BRANDS, INC. and  
WACOAL AMERICA, INC.,

Defendants.

Index No. 13-cv-06122 (LDW) (GRB)

**STIPULATION AND [PROPOSED]  
ORDER REGARDING EXTENSION  
OF TIME TO RESPOND TO  
COMPLAINT**

Plaintiffs Christina Caramore and Michelle Martin (“Plaintiffs”) and Defendant Wacoal America, Inc. (“Wacoal”) hereby stipulate and request that the Court enter an order as follows:

WHEREAS Wacoal will not challenge the adequacy of service, but preserves all other defenses, including lack of personal jurisdiction; and

WHEREAS the Complaint in this action was served on Wacoal on December 12, 2013, and Wacoal’s current deadline to answer, move to dismiss, or otherwise respond to the Complaint is January 2, 2014; and

WHEREAS, the parties have agreed on the briefing schedule set forth herein in light of the winter holidays and prior commitments of counsel;

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned attorneys for the parties that the time within which the Wacoal may move, answer or otherwise respond to the Complaint, is hereby extended to and including January 31, 2014; that the time within which Plaintiffs may oppose any motions to dismiss filed by

Wacoal is hereby extended to and including March 3, 2014; and that the time within which Wacoal may file a reply in further support of any motion to dismiss is hereby extended to March 21, 2014. No previous requests for an extension have been made.

ACCORDINGLY, IT IS HEREBY ORDERED THAT the deadline for Wacoal to answer, move to dismiss, or otherwise respond to the Complaint shall be extended to and including January 31, 2014; that the time within which Plaintiffs may oppose any motion to dismiss filed by Wacoal is hereby extended through and including March 3, 2014; and that the time within which Wacoal may file a reply in further support of any motion to dismiss is hereby extended to March 21, 2014.

Dated: New York, New York  
December 20, 2014

HAGENS BERMAN SOBOL  
SHAPIRO LLP

By: 

Elizabeth A. Fegan  
1144 W. Lake Street, Suite 400  
Oak Park, IL 60301  
Telephone: (708) 628-4960  
Email: beth@hbsslaw.com

*Attorneys for Plaintiffs Christina Caramore  
and Michelle Martin*

MORRISON & FOERSTER LLP

By: 

Jessica L. Kaufman  
1290 Avenue of the Americas  
New York, New York 10104-0050  
Telephone: (212) 468-8000  
Email: jkaufman@mofo.com

*Attorneys for Defendant Wacoal America,  
Inc.*

Entered this \_\_\_\_ day of \_\_\_\_\_, 2013

\_\_\_\_\_  
The Honorable Leonard D. Wexler  
United States District Court Judge